

## **EXHIBIT I**

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1 UNITED STATES BANKRUPTCY COURT  
2 FOR THE EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION - DETROIT  
4 -----  
5 In re: Chapter 9  
6 CITY OF DETROIT, MICHIGAN, Case No. 13-53846  
7 Debtor, Hon. Steven W. Rhodes  
8 -----  
9 V I D E O T A P E D D E P O S I T I O N O F  
10  
11 WITNESS: GOVERNOR RICHARD D. SNYDER  
12 LOCATION: The Romney Building  
13 111 S. Capitol Avenue  
14 Lansing, Michigan  
15  
16 DATE: Wednesday, October 9, 2013  
17 8:38 a.m.  
18  
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<p style="text-align: right;">Page 129</p> <p>1 Do you have any knowledge first or</p> <p>2 secondhand as to whether that is true or not?</p> <p>3 A. I don't recall that.</p> <p>4 Q. Do you recall a reason that the 19th was selected as</p> <p>5 the date that Mr. Orr would file bankruptcy?</p> <p>6 A. One of the factors most likely was probably my</p> <p>7 schedule, because this was a major media rollout, in</p> <p>8 terms of availability.</p> <p>9 Q. Okay.</p> <p>10 A. At that -- the letter was coming and I wanted time</p> <p>11 to contemplate and then we would look at the</p> <p>12 schedule to say when is there a good opportunity to</p> <p>13 have good communications.</p> <p>14 Q. Leaving aside conversations you had with your</p> <p>15 attorneys --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- in the days preceding the 17th say, say earlier</p> <p>18 that week --</p> <p>19 A. Yeah.</p> <p>20 Q. -- were you privy to any conversations where the</p> <p>21 idea was thrown out that if we have the filing on</p> <p>22 the 19th that would oust Aquilina of jurisdiction on</p> <p>23 the 22nd? Do you understand what I'm asking, or</p> <p>24 words to that effect?</p> <p>25 A. Yeah, I don't recall it.</p>	<p style="text-align: right;">Page 131</p> <p>1 A. Well, you did ask me. You said they were in the</p> <p>2 courtroom, did then I act. And I acted prior to</p> <p>3 them being in the courtroom.</p> <p>4 Q. No. Okay. Fair enough.</p> <p>5 A change was made between the 19th and the</p> <p>6 18th as to the filing itself. You understand that?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Correct?</p> <p>9 A. Yes.</p> <p>10 Q. And I'll represent to you that at Mr. Orr's</p> <p>11 deposition he confirmed that the typed in date of</p> <p>12 the 19th on the bankruptcy petition, the handwritten</p> <p>13 eight was his handwriting.</p> <p>14 Do you know anything about why the change</p> <p>15 was made from the 19th to the 18th?</p> <p>16 A. Yes.</p> <p>17 Q. What do you know about it? Just tell me.</p> <p>18 A. I made the decision that I was comfortable in my</p> <p>19 conclusion that it was appropriate to file.</p> <p>20 When the letter came to me on the 16th in</p> <p>21 terms of recommending bankruptcy, I had set aside to</p> <p>22 say I wanted an extended period of time to review</p> <p>23 and to contemplate the situation. So I actually set</p> <p>24 aside enough time that would have led to the Friday</p> <p>25 morning situation to say I wanted more than one</p>
<p style="text-align: right;">Page 130</p> <p>1 Q. You don't recall?</p> <p>2 A. And again, that would be -- this is where we're back</p> <p>3 to if there were other discussions, it would've been</p> <p>4 attorney-client privilege, but I don't recall even</p> <p>5 in that context.</p> <p>6 Q. We know that, in fact, the filing was made on the</p> <p>7 18th?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Correct?</p> <p>10 A. Correct.</p> <p>11 Q. That would be an unusual circumstance; would it not?</p> <p>12 That is, that you put together this very detailed</p> <p>13 rollout down to what's going to happen at 11 a.m. a</p> <p>14 couple days later and what's happening at noon and</p> <p>15 1:30. It would be rare in terms of your work as</p> <p>16 Governor for a significant event like this for the</p> <p>17 date to move at the last minute; would it not?</p> <p>18 A. Well, this is a unique circumstance.</p> <p>19 Q. Yeah. On that we agree.</p> <p>20 Was the unique circumstance the fact that</p> <p>21 the litigants in the three cases were in court on</p> <p>22 the 18th in front of Judge Aquilina in the afternoon</p> <p>23 seeking emergency injunctive relief?</p> <p>24 A. I had signed my letter prior to that.</p> <p>25 Q. It's not what I asked you, Governor.</p>	<p style="text-align: right;">Page 132</p> <p>1 night to sleep on this because the importance of</p> <p>2 this act.</p> <p>3 And as I proceeded through the thought</p> <p>4 process to say do I concur, am I going to authorize</p> <p>5 the bankruptcy, I started discussions with my legal</p> <p>6 counsel on how we would prepare a letter, how we</p> <p>7 would go through that process and my thought</p> <p>8 process, and I felt I didn't need to wait. I had</p> <p>9 made my decision, I had consulted with legal</p> <p>10 counsel, we had prepared a letter authorizing</p> <p>11 bankruptcy, and I said we should just go ahead and</p> <p>12 get this done.</p> <p>13 Q. And as far as you know, that decision, the fact that</p> <p>14 there was -- were requests for immediate injunctive</p> <p>15 relief on that day in state court had nothing to do</p> <p>16 with moving up the time?</p> <p>17 A. People showed up in state court after that, and what</p> <p>18 I would say is the consideration I had was the</p> <p>19 filing of -- the lawsuits being filed in the prior</p> <p>20 week or two weeks had some impact on my</p> <p>21 decision-making process.</p> <p>22 Q. Right.</p> <p>23 A. And the reason I said that is because I could see</p> <p>24 lawsuits being filed not only on pension issues but</p> <p>25 could be filed by other creditors, by financial</p>